UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

STEFAN QIN, VIRGIL TECHNOLOGIES LLC, MONTGOMERY TECHNOLOGIES LLC, VIRGIL QUANTITATIVE RESEARCH, LLC, VIRGIL CAPITAL LLC, and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (LGS)

NOTICE OF RECEIVER'S MOTION FOR AN ORDER APPROVING THE RETENTION OF THE LAW OFFICE OF DENNIS COHEN

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and upon all the prior pleadings and proceedings herein, Robert A. Musiala, Jr., the Court-appointed Receiver in the above-captioned case (the "Receiver"), by and through his counsel, moves this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an order granting the Receiver's motion for approval to retain the Law Office of Dennis O. Cohen, PLLC as special counsel, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that this Motion is made with the consent of

Plaintiff. The Receiver respectfully requests that this Motion be decided on an expedited basis.

Dated: February 11, 2022

New York, New York

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